UNITED STATES OF AMERICA

Before The OCT | | 52 PN '01

POSTAL RATE COMMISSION

WASHINGTON, D.C. 20268-000 STAL RATE COMMISSION

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OFFICE OF THE SECRETARY

| Complaint on First-Class Mail | ) | Docket No. C2001-3 |
|-------------------------------|---|--------------------|
| Service Standards             | ) |                    |

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
DECLARANT: CHARLES M. GANNON (OCA/USPS-GAN-1)
October 11, 2001

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-15 dated September 17, 2001, are hereby incorporated by reference.

Respectfully submitted,

SHELLEY S. DREIFUSS

**Acting Director** 

Office of the Consumer Advocate

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Docket No. C2001-1

OCA/USPS-GAN-1. Please refer to paragraph 18 of the Declaration of Charles M. Gannon, which the Postal Service filed on July 30, 2001. In this paragraph, you cited a goal of "improved consistency." Please identify and cite the types of information and data available to you that led you to believe that opportunities or a need existed to improve consistency in First-Class Mail delivery. If possible, please provide the information and data on which you relied.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

h'Enri Whitseyjohnson

Washington, D.C. 20268-0001 October 11, 2001